John Jonik 2049 East Dauphin Street Philadelphia, Pennsylvania 19125

Livestock and seed Programs Agriculture Marketing Service US Department of Agriculture Stop 0249 Room 2092-S Washington DC 20250-0249

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Public Comment on School Lunch Program & Food Irradiation

For the following reasons, I ask you to do all possible to assure that irradiated foods will not be permitted to be served to school children in the National School Lunch Program.

- * Irradiated foods have not been adequately tested for safety. Testing that claimed to show safety was conducted by those with motives, perhaps duties, to tilt findings in favor of this technology. Such studies must be discarded in order to maintain public trust of the nation's food supply.
- * Independent tests, on the other hand, have revealed problems relating to damage to vitamins, formation of novel chemicals that have not been tested, and to the creation of free radicals, which have long been linked to development of cancers.
- * Growing, developing young people are the most vulnerable to insults to their developing systems. Experimental irradiation technologies used on children, who cannot give informed consent, constitute violations of basic human rights.
- * The purpose for using this technology, despite expected claims from developers that it is about health, is to save food producers the trouble and expense of assuring clean, sanitary, food processing, shipping and vending situations. Few, if any consumers, relish the idea of consuming fecal matter, for example, no matter how "sanitized" it may be.
- * Use of radioactive waste materials to implement the process, is to risk massive public endangerment by shipping it to food processors all over the country and then maintaining what must be absolute security. Absolute security is virtually impossible in the best conditions or with relatively few storage sites. This broad distribution maximizes the risk...and also tells consumers that these food interests are not above risking public health.
- * Despite virtually unlimited access to the mainstream media, despite virtually unlimited funds to utilize the most persuasive experts and advertisers, the industry has been unable to "sell" this idea. It is inherently untrustworthy. It is impossible for almost anyone to accept the idea, from a private, self-serving industry, that, after millions of years evolving to accommodate natural foods, humans can adapt to novel foods overnight.

- * The policy whereby parents or children will not be advised of what foods are irradiated, and not given a choice between forms of food, indicates well-founded embarrassment, at least, by the industry at their own technology. For a public agency to fail to advocate for the public to demand that the public be informed, especially those directly affected, is an insult to basic principles of democracy.
- * To my understanding, the food irradiation industry, despite its experimental nature and the high likelihood of risk, has not been compelled to post a bond to cover any future health harms or radiation accidents. This, of course, indicates even further lack of their own confidence in their own technologies. This, in effect, constitutes the industry "sending the message" that the technologies are unsafe. Perhaps they hope to pass costs of liabilities onto the victims directly or via public bail-outs.
- * The introduction of irradiated foods into the public school system, in this manner or otherwise, threatens the public school system in that parents who can afford private schooling for children, will remove their children from this threat. If this is even a possibility, if not a behind-the-scenes, secondary intention of this program, it is unacceptable. Those left behind, who cannot afford private schooling (with trustworthy food), would largely be low-income people who do not have access to health care in case of negative health results of this experiment. It is unlikely that most of these people will now even have the opportunity to comment.
- * The failure to require labeling and clear information about what is or is not irradiated constitutes an attack on free trade and an intolerable attack on producers of organic or non-irradiated foods. Those who place investments in the organic and/or non-irradiated food industry would have their investments undercut by agents of their own government who, to many indications, are not regulating but are, instead, promoting one industry over another. If food producers who now hope to profit and save sanitation costs by this technology cannot survive on their own, supply-and-demand economic principles indicate that they ought move to a traditional, viable business.

Sincerely,

John Shik

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